

**Exhibit A**

**Proposed Order**

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*  
*al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

This filing relates to PREPA.

**ORDER GRANTING FOUR HUNDRED THIRTEENTH OMNIBUS OBJECTION  
(SUBSTANTIVE) OF THE PUERTO RICO ELECTRIC POWER AUTHORITY TO CLAIMS  
THAT ARE PARTIALLY SATISFIED AND PARTIALLY FOR AMOUNTS  
FOR WHICH PREPA IS NOT LIABLE**

Upon the *Four Hundred Thirteenth Omnibus Objection (Substantive) of the Puerto Rico Electric Power Authority to Claims That Are Partially Satisfied and Partially for Amounts for Which PREPA Is Not Liable* [ECF No. 19550] (the “Four Hundred Thirteenth Omnibus Objection”),<sup>2</sup> filed by the Puerto Rico Electric Power Authority (“PREPA”), dated December 17,

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5532-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to such terms in the Four Hundred Thirteenth Omnibus Objection.

2021, for entry of an order reducing the amount of certain claims filed against PREPA on the basis that these claims are partially satisfied and that PREPA has no liability for additional portions of the claims, as more fully set forth in the Four Hundred Thirteenth Omnibus Objection and supporting exhibits thereto; and the Court having jurisdiction to consider the Four Hundred Thirteenth Omnibus Objection and to grant the relief requested therein pursuant to PROMESA section 306(a); and venue being proper pursuant to PROMESA section 307(a); and due and proper notice of the Four Hundred Thirteenth Omnibus Objection having been provided to those parties identified therein, and no other or further notice being required; and the Court having determined that the claims identified in the column titled “Asserted” in Exhibit A to the Four Hundred Thirteenth Omnibus Objection (collectively, the “Claims to Be Partially Disallowed”) having been found to be satisfied in part; and the Court having determined that the other portions of the Claims to Be Partially Disallowed seek recovery of amounts for which PREPA is not liable; and the Court having determined that the relief sought in the Four Hundred Thirteenth Omnibus Objection is in the best interests of PREPA, its creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Four Hundred Thirteenth Omnibus Objection establish just cause for the relief granted herein; and the Court having deemed a hearing is not necessary as no objection, responsive pleading, or request for a hearing with respect to the Four Hundred Thirteenth Omnibus Objection has been submitted, and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED that the Four Hundred Thirteenth Omnibus Objection is GRANTED as set forth herein; and it is further

ORDERED that the Claims to Be Partially Disallowed are hereby reduced and disallowed to the extent they assert claims for amounts already paid and/or for which PREPA has

no liability, such that the Claims to Be Disallowed shall now only be considered claims asserting the amount set forth in the column titled “Remaining Claim” in Exhibit A to the Four Hundred Thirteenth Omnibus Objection, respectively; and it is further

ORDERED that PREPA’s right to object to the remaining portions of these claims, as set forth in the column titled “Remaining Claim” in Exhibit A to the Four Hundred Thirteenth Omnibus Objection, is reserved; and it is further

ORDERED that Kroll is authorized and directed to delete and reduce the amount asserted in the Partially Satisfied Claims by the disallowed portions (*i.e.*, reducing the amount of the claims to the amounts set forth in the column titled “Remaining Claim” in Exhibit A to the Four Hundred Thirteenth Omnibus Objection) from the official claims register in the PREPA Title III Case; and it is further

ORDERED that this Order resolves Docket Entry No. 19550 in Case No. 17-3283; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

SO ORDERED.

Dated: \_\_\_\_\_

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Honorable Judge Laura Taylor Swain  
United States District Judge

**EXHIBIT A**

**Schedule of Claims Subject to the Four Hundred Thirteenth Omnibus Objection**

## FOUR HUNDRED THIRTIETH OMNIBUS OBJECTION

## Exhibit A - Partially Satisfied / Partially No Liability Claims

NAME	DATE FILED	CASE NUMBER	DEBTOR	CLAIM #	ASSERTED CLAIM AMOUNT	SATISFIED AMOUNT	NO LIABILITY AMOUNT	REMAINING CLAIM
1 CONTROL ASSOCIATES OF PR 475 CALLE C STE 503 GUAYNABO, PR 00969-4272	5/9/2018	17-03283	PUERTO RICO ELECTRIC POWER AUTHORITY	12801	\$139,566.05	\$123,223.06	\$320.00	\$16,022.99
Reason: Liabilities associated with the claim have been paid by PREPA in part.								
2 LINDE GAS PUERTO RICO INC. PO BOX 363868 SAN JUAN, PR 00936-3868	4/2/2018	17-03283	PUERTO RICO ELECTRIC POWER AUTHORITY	5815	\$1,038,485.89	\$211,063.12	\$742,500.00	\$84,922.77
Reason: Liabilities associated with the claim have been paid by PREPA in part. PREPA is not liable for a part of the liabilities associated with the claim because the claimant only provided quotes and not invoices. PREPA is unable to identify invoices using a quote.								
3 LORD ELECTRIC COMPANY OF PUERTO RICO PO BOX 363408 SAN JUAN, PR 00936	6/18/2018	17-03283	PUERTO RICO ELECTRIC POWER AUTHORITY	166292	\$1,235,417.96	\$964,669.72	\$10,743.75	\$260,004.49
Reason: Liabilities associated with the claim have been paid by PREPA in part. PREPA is not liable for a part of the liabilities associated with the claim because PREPA's record of certain of the invoices that have been paid are less than the invoices that were provided by the claimant.								
4 ROONEY RIPPPIE & RATNASWAMY LLP JOHN RATNASWAMY ROONEY RIPPPIE & RATNASWAMY LLP 350 W. HUBBARD ST., SUITE 600 CHICAGO, IL 60654	5/25/2018	17-03283	PUERTO RICO ELECTRIC POWER AUTHORITY	21683	\$494,988.95	\$452,450.04	\$7,676.36	\$34,862.55
Reason: Liabilities associated with the claim have been paid by PREPA in part. PREPA is not liable for a part of the liabilities associated with the claim because monies were held properly pursuant to Puerto Rico tax law.								

\* - Indicates claim contains unliquidated and/or undetermined amounts.